

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
Clerk's Office
USDC, Mass.
Date 12-13-09
By [Signature]
Deputy Clerk

JUDITH RÉ,

Plaintiff,

v.

JODI R.R. SMITH, and
BARNES & NOBLE INC.

Defendants.

Civil No. 04-11385-RGS

AFFIDAVIT OF JUDITH RÉ MORGAN

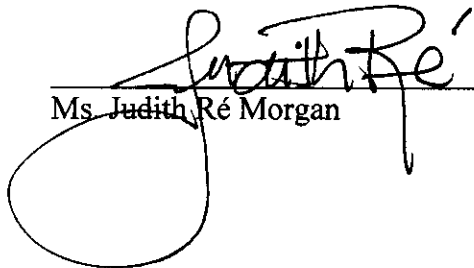
I, Judith Ré Morgan, do hereby swear and depose as follows:

1. I am an etiquette consultant residing in the Fairfield, Connecticut area.
2. Attached as Exhibit A is a true and accurate compilation of print media references to my etiquette instruction work under the SOCIAL SAVVY® brand name.
3. I have personally been interviewed about my SOCIAL SAVVY® brand of etiquette instruction on CNN, the Today Show, Good Morning America, American Journal, the Joan Rivers Show, the Montel Williams Show, The View, The Travel Channel, BBC and BBC Radio.
4. Over the years, my clients have included, among others, a former United States diplomat to the Vatican, the Four Seasons Hotels & Resorts in Chicago, Seattle and San Francisco, the Century Plaza Hotel in Los Angeles, the Palace Hotel in New York, the Ritz-Carltons in Boston, New York, Cleveland and Washington D.C., Hilton Hotel in Short Hills, N.J. and the Hyatt in Greenwich, CT, and businesses and groups like Astra Pharmaceuticals, Liberty Mutual, Harcourt General and the Japanese Travel Bureau.

5. My national media exposure has significantly enhanced my goodwill and reputation in the etiquette instruction industry.

6. I first learned of the book Social Savvy for the 90's from defendants after the commencement of this litigation. The book is apparently self-published and is not widely distributed. I have never seen a copy of this book and have no idea of its purpose, subject or content.

Signed under the pains and penalties of perjury this thirteenth day of December, 2004.


Ms. Judith Ré Morgan

Judith Ré Print Media Compilation

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